

To Subject Re. Plainwell access road materials

Steve,

Part 115 allows the use of inert material for construction. Broken concrete can be classified as inert as long as it is not contaminated with Hazardous substances. Section R299.4114 (3) of the Part 115 rules indicates that a contaminated determination for the material can be made through testing or by "applying knowledge of the material". As such, I would say Plainwell Aggregate Industries needs to verify the concrete was not contaminated through their knowledge of the source and handling of the material (e.g. chemical spills, application of paint or coatings, etc.) or testing needs to be conducted in accordance with Section R299.4118 of the Part 115 Rules. Hope this bureaucratic response helps...let me know if you have any follow up questions.

## Thanks

>>> "Garbaciak, Steve" <Steve.Garbaciak@arcadis-us.com> 03/22/07 12:38 AM >>>

## Sam and Paul:

We are considering the use of crushed concrete for construction of the access roads at Plainwell- Aggregate Industries has a plentiful supply right there in Plainwell. What issues, if any, would your agencies have

with the use of such material? Thanks.

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